

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:
DELBERT REYNALDO BAUM,

Debtor.

CASE NO. 13-09168-KL3-7
CHAPTER 7
JUDGE KEITH M. LUNDIN

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: March 25, 2014
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: April 8, 2014
at 9:00 a.m., Courtroom 2, Second Floor, Customs House, 701 Broadway Nashville, TN 37203.

TRUSTEE'S NOTICE OF MOTION TO EMPLOY ATTORNEY FOR TRUSTEE

Michael Gigandet, the Chapter 7 trustee, has asked the court for the following relief: TO EMPLOY ATTORNEY FOR TRUSTEE

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion, or if you want the court to consider your views on the motion, then on or before March 25, 2014, you or your attorney must:

1. File with the court your written response or objection explaining your position at:

By Mail: U.S. Bankruptcy Court, 701 Broadway, Room 160, Nashville, TN 37203
In Person: U.S. Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, TN 37203
2. **Your response must state that the deadline for filing responses is March 25, 2014, the date of the scheduled hearing is April 8, 2014 and the motion to which you are responding is trustee's motion to employ attorney for trustee.**
If you want a file stamped copy returned, you must include an extra copy and a self-addressed, stamped envelope.
3. You must also mail a copy of your response to:
Michael Gigandet, Trustee, 208 Centre Street, Pleasant View, TN 37146
U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203
Debtor, Delbert Reynaldo Baum, 102 Church St., Clarksville, TN 37042
Debtor's Attorney, ROBERT HAMM MOYER, 408 FRANKLIN ST, CLARKSVILLE, TN 37040

If a timely response is filed, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by calling the Clerk's Office at 615-736-5584 or viewing the case on the Court's web site at <www.tnmb.uscourts.gov>. If you received this notice by mail, you may have three additional days in which to file a timely response under Rule 9006(f) of the Federal Rules of Bankruptcy procedure.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: March 4, 2014

Respectfully submitted,

LAW OFFICE OF MICHAEL GIGANDET

/s/ Michael Gigandet

Michael Gigandet, Trustee #11498
208 Centre Street
Pleasant View, TN 37146
615-746-4949
michael@mgigandet.com

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TRUSTEE'S MOTION TO EMPLOY ATTORNEY FOR TRUSTEE

Comes now Michael Gigandet, the duly appointed Chapter 7 trustee, and files this his motion to employ an attorney for trustee, and would state as follows:

1. The Trustee was duly appointed as trustee for the above- styled estate and duly qualified.
2. The Trustee requests approval of this Court to employ Michael Gigandet, 208 Center Street, Pleasant View, TN, 37146, as attorney to represent the Trustee in the above-styled matter.
3. The Trustee anticipates that the services the attorney may render include, but are not limited to:
 - a. Preparing all legal documents, applications, orders, and deeds necessary for the orderly liquidation of any and all assets of the debtor's estate.
 - b. Collecting any outstanding accounts receivable.
 - c. Pursuing any of the trustee's actions under Section 546, 547, 548 or 549 of the Bankruptcy Code against the debtor or third parties.
 - d. Investigating the possibility of filing an objection to the discharge of the debtor under Section 727.
 - e. Pursuing other legal actions the Trustee may have against third parties.
4. The Trustee has selected Michael Gigandet as counsel because of his experience and knowledge in the fields of bankruptcy, insolvency and debtor and creditor rights. Specifically, Michael Gigandet has over twenty (20) years experience in bankruptcy and is well qualified to perform the necessary legal services.
5. The current hourly rate for this individual who may perform services in this proceeding are as follows: Michael Gigandet - \$400.00. (This rate may be subject to periodic increases). No compensation will be paid to this person from funds of the estate except upon application to and approval by the Court.
6. Michael Gigandet does not represent any interest adverse to the trustee of the estate in the matters upon which they are to be engaged and such employment is in the best interest of the estate. Further, Michael Gigandet is a disinterested person within the meaning of 11 U.S.C. Section 101 (14).

WHEREFORE, your applicant respectfully requests that he be authorized to employ Michael Gigandet as attorney for the Trustee, and for such other relief as is necessary and appropriate.

BY SIGNATURE BELOW, I, Michael Gigandet, hereby verify under penalty or perjury, that the statements contained in the foregoing application are true and correct to the best of my knowledge, information and belief, and that I have no connection with the debtor, the creditors, or any other party in interest (other than the trustee), or their respective attorneys or accountants, the United States Trustee, or any person employed in the office of the United States Trustee (except as follows):

Michael Gigandet is a member of the Chapter 7 Trustee panel.

Respectfully submitted,

LAW OFFICE OF MICHAEL GIGANDET

/s/ Michael Gigandet

Michael Gigandet, Trustee #11498
208 Centre Street
Pleasant View, TN 37146
615-746-4949
Fax: 615-746-4949
michael@mgigandet.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded by U. S. Mail, 1st class postage prepaid, to the U. S. Trustee's office, 318 Customs House, 701 Broadway, Nashville, TN 37203, to the debtor (s), to the debtor's attorney and to all creditors and all interested parties, per the mailing matrix attached to and filed with the original of this document, on this the 4th day of March, 2014.

/s/ Michael Gigandet

Michael Gigandet

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**PROPOSED ORDER AUTHORIZING EMPLOYMENT OF
ATTORNEY FOR THE TRUSTEE**

Upon the motion of Michael Gigandet, Trustee, for approval to employ Michael Gigandet as attorney for the Trustee, and there being no objections filed thereto:

IT IS HEREBY ORDERED that Michael Gigandet, Trustee, is authorized to employ Michael Gigandet as attorney to represent the trustee as counsel in this matter.

IT IS FURTHER ORDERED that counsel for the trustee shall make application to the court for approval of all compensation.

Entered this _____ day of _____, 2014.

APPROVED FOR ENTRY

LAW OFFICE OF MICHAEL GIGANDET

Michael Gigandet, Trustee #11498
208 Centre Street
Pleasant View, TN 37146
615-746-4949
Fax: 615-746-4949
michael@mgigandet.com

Afni, Inc.
PO Box 3517
Bloomington, IL 61702-3517

Finance & MTG Accept
1820-C Madison St.
Clarksville, TN 37043-8037

SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

Bank Of America
P.O. Box 53181
Phoenix, AZ 85072-3181

GECRB
PO Box 965015
Orlando, FL 32896-5015

Sun Loan Company
1671 Fort Campbell Blvd
Clarksville, TN 37042-3583

Capital One
P.O. Box 30281
Salt Lake City, UT 84130-0281

Montgomery Co. Circuit Court
2 Millenium Plaza, #115
Clarksville, TN 37040-3492

Unique National Collections
119 E Maple Street
Jeffersonville, IN 47130-3439

Cash City
1987 Madison Street
Clarksville, TN 37043-5067

Peter M. Olson
Pete Olson Law
114 Franklin St.
Clarksville, TN 37040

US TRUSTEE
OFFICE OF THE UNITED STATES
701 BROADWAY STE 318
NASHVILLE, TN 37203-3966

Charter - Clarksville
1850 Business Park Dr. #101
Clarksville, TN 37040-6085

Portfolio Recovery
120 Corporate Blvd., Ste. 100
Norfolk, VA 23501

WebBank/Fingerhut
6250 Ridgewood Road
Saint Cloud, MN 56303-0820

Clarksville Cash Advance
1402 A For Campbell Blvd
Clarksville, TN 37042-3698

PORTFOLIO RECOVERY ASSOCIATES
PO BOX 41067
NORFOLK VA 23541-1067

World Finance
569 Riverside Dr
Clarksville, TN 37040-3107

Clarksville-Montgomery County Public Lib
350 Pageant Lane, Suite 501
Clarksville, TN 37040-3813

ROBERT HAMM MOYER
408 FRANKLIN ST
CLARKSVILLE, TN 37040-3424

Continental Service Group, INC
P.O. Box 3023
Niagara Falls, NY 14304-7323

Sallie Mae
PO Box 9500
Wilkes-Barre, PA 18773-9500

Credit Management LP
4200 International Blvd.
Carrollton, TX 75007-1912

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Po Box 3146
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Delbert Reynaldo Baum
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